

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

*as representative of*

THE COMMONWEALTH OF PUERTO RICO et al.,

Debtors.

No. 17 BK 03283-LTS

PROMESA  
TITLE III

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U.S. DISTRICT COURT  
SAN JUAN, P.R.  
RESPONSE TO THREE HUNDRED SEVENTY FOURTH  
OMNIBUS OBJECTION  
(Docket No. 17923)

**Responding Claimants**

1. Elaine Lynn Irrevocable Trust - Claim Number 179215 - Listed as number 240 on Exhibit "A" to the Three Hundred Seventy Fourth Omnibus Objection (Docket # 17923).
2. Melvin Lynn Revocable Trust - Claim Number 179204- Listed as number 509 on Exhibit "A" to the Three Hundred Seventy Fourth Omnibus Objection (Docket # 17923).

**Responding Claimants' Contact Information and Authority**

This response is submitted by Melvin Lynn, pro se, as the Trustee of both the Elaine Lynn Irrevocable Trust and Melvin Lynn Revocable Trust .

Melvin Lynn can be reached as follows:

Address 7562 Granville Drive

Tamarac, FL 33321

Phone (954) 663-0891

Email Address: [melynnman@aol.com](mailto:melynnman@aol.com)

Melvin Lynn as trustee for the claimants and has full authority to reconcile these claims.

**Reason for Opposing the Omnibus Objection**

Your Honor, My wife and I worked at our professions for 50 years with the purpose of securing a safe secure future for our family. My wife and I graduated in 1954, both of us at age 21. We began working and planning for our young family's welfare. We led a frugal life and always thought about our children's needs. I was an engineer and worked diligently always trying to work as many hours permitted and my wife who was a school teacher also worked at all jobs available to her. She did not take summers off but worked at day camps so our children could attend without cost. This was the pattern of our life, saving for our family to provide necessities and some luxuries.

It is with these thoughts in mind that I oppose Omnibus Objection. My wife passed away at 76 years of age. I retired soon after. We had worked over 50 years and believed that we lived a good, honorable life. However we found out that the money destined for our family's security, which was invested in Puerto Rico municipal bonds had evaporated and the bonds declared bankruptcy. The bonds stopped paying their interest and the principal was in jeopardy. It was a devastating blow. We could not afford to sell the bonds. The price was very low, however we believed that if we held on we would someday be compensated. Which brings me to the question at hand concerning Mr. Jay Herriman's recommendation that if your paper work isn't in on time you have lost your rights to compensation from your financial investments. Please permit me to discuss some personal matters that effect my responses to the courts orders concerning paper work responses.

I am now 88 years old. During the last 3 years my health has markedly deteriorated. All of the maladies required time in the hospitals, and time in rehab. Still with all of the above problems I was able to take care of most of my obligations. To this point I have received and responded to all notices I received from the court. This can be corroborated with the Prime Clerk of the Court. With whom I checked to assure my responses were received.

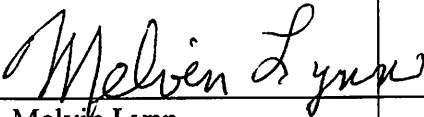
I cannot pinpoint why I was late responding to the submittal in question. There are many plausible explanations, such as the mail was slow in receipt, which was very common during Covid, the mail may have come when I was in the hospital or rehab. It may have gotten lost in the post office and been delivered late.

All of the above possibilities are plausible and one of them may have occurred, however overriding the explanations I do not believe that an organization hired by the debtors should have the right to trample the truth that we invested a portion of our life savings meant for my family because a paper was delivered late. In fairness and with a cry for justice and leniency I request that the court not punish us creditors. We have suffered sufficiently financially and experienced years of worry leading to sleepless nights.

#### **Supporting Documentation**

There are 2 supporting documents, #1, and #2 are proofs of claim that the supporting data for Elaine Lynn Irrevocable trust (#1) and for the Melvin Lynn Revocable Trust (#2), were available at the Prime Clerk's facility because this information was submitted each and every time Proof of Claim was requested by the court. The data in the attachments were extracted from a monthly account reports supplied by JP Morgan. For each occasion that proof of claim was requested, the same data was supplied.

Dated: September 8, 2021  
Tamarac, Florida

  
Melvin Lynn